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April 25, 2012

FEC - RAD
Reports Analysis Div.

VIA HAND DELIVERY

Ms. Deborah Chacona
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

26 APR '12 RCVD

Re: Restore Our Future, Inc. Request for Determination Regarding Reporting
Expenditures for National Ad Buys

Dear Ms. Chacona:

I am writing to you in response to the Federal Election Commission's ("FEC") two Requests For Additional Information ("RFAI") sent to Restore Our Future, Inc. ("ROF") on March 13, 2012, as well as conversations with the FEC's Reports Analysis Division ("RAD") senior staff over the past month. In these letters, RAD requested additional information regarding three Form 3-X, Schedule E, 24 and 48 hour expenditure reports ("24/48 hour reports") filed by ROF: namely reports for February 15, 2012 in the amount of \$7,706.52, and \$417,527.50, and for February 21, 2012 in the amount of \$416,973.75.

Specifically, RAD is asking us to retroactively itemize these expenditures on a per-state basis, and continue to report this way in the future. This arbitrary and burdensome request and interpretation of the regulations is not supported by any reasonable reading of either the statute or the regulations, and will generate inaccurate and meaningless statistics.

The expenditures in question were national cable media buys from the FoxNews network. Unlike broadcast media buys, made on a local-affiliate basis, this buy was aired to every FoxNews cable subscriber nation-wide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such a buy on a per-state basis. Moreover, because RAD has specifically stated it intends to require per-state itemization for every future 24/48 hour report, it creates a difficult and burdensome request with which to comply. Taking into account the unique nature of Presidential primaries, with multiple elections in short periods